BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Periodic Reporting   Docket No. RM2020-2
(Proposal Ten)

PUBLIC REPRESENTATIVE MOTION
FOR ISSUANCE OF INFORMATION REQUEST 1

(December 12, 2019)

Pursuant to 39 C.F.R. § 3001.21(a) and 39 C.F.R. § 3007.3(c), the Public
Representative (PR) requests that an Information Request be issued to obtain
additional clarifying data and information from the Postal Service concerning the
proposed changes to analytical methods for calculating the variability of Postmaster
costs, labeled as Proposal Ten.[1] The proposed questions seek information that will
allow participants to provide comments that are more constructive and evaluate whether
the proposal meets the applicable legal and regulatory requirements. Obtaining this
information will also contribute to a better understanding of how the Postal Service has
interpreted Commission rules and allow the Commission to make a fully informed,
reasoned determination on whether Proposal One meets applicable legal and regulatory
requirements, including 39 U.S.C. § 3652(e)(2) and 39 C.F.R. part 3050.

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[1] Petition of the United States Postal Service for the Initiation of a Proceeding to Consider
Proposed Changes in Analytical Principles (Proposal Ten), November 29, 2019. (Petition).

Proposed Questions

The following questions seek information regarding Workload Service Credits (WSCs) used in the study entitled "Investigating the Variability of Postmaster Costs." (Bradley Study).[2]

1. Please refer to Figure B in Docket No. R84-1, Direct Testimony of Nai-Chi Wang (Wang Testimony), USPS-T-12, filed November 10, 1983, at 17.

    a. Please confirm that the Workload Factors and their associated weights in Witness Wang's testimony are the same as presented in Table 1 below. If you do not confirm, please explain.

Table 1

#	Quantitative Indicators of Activities (Workload Factors) WLQ_q	Multipliers (Weights) WLQ_i
(A)	(B)	(C)
(1)	General delivery families served	1.00
(2)	Post office boxes/call boxes rented	1.00
(3)	Possible city deliveries	1.33
(4)	Administrative rural boxes served	1.00
(5)	Intermediate rural boxes served	0.60
(6)	Administrative highway contract boxes	0.60
(7)	Intermediate highway contract route boxes	0.50
(8)	Administrative responsibility for (5) for other offices	0.20
(9)	Administrative responsibility for (7) for other offices	0.10

    b. Please confirm that Revenue Units and their associated weights in Witness Wang's testimony are the same as presented in Table 2 below. If you do not confirm, please explain.

Table 2

#	Revenue Units RU_r	Revenue Unit Bands	Multipliers (Weights) RU_j
A	B	C	D
10 (a)	First 25 Revenue Units	0 – 25	1.00
10 (b)	Next 275 Revenue Units	26 – 300	0.50
10 (c)	Next 700 Revenue Units	301 – 1,000	0.25
10 (d)	Next 5,000 Revenue Units	1,001 – 6,000	0.10
10 (e)	Thereafter	6,000 +	0.01

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[2] See, Proposal Ten, Report.Prop.Ten.Postmasters.pdf, entitled "Investigating the Variability of Postmaster Costs" (Bradley Study), at 1, November 29, 2019.

c. Please confirm that the formula for WSCs provided by Witness Wang is the weighted average or "weighted sum" of Workload Factors plus the weighted average or sum of Revenue Units,[3] where WLQ_q is the quantity of each of 9 Workload Factors, WLQ_i is the weight corresponding to each workload factor, RU_j is the number of revenue units for rows 10(a)-10(e), and RU_j is the corresponding weight for each "band" of Revenue Units. If you do not confirm, please explain.

$$WSC = \sum_{q,i=1}^{9} \left(WLQ_q * \text{WLQ}_i\right) + \sum_{r,j=a}^{e} \left(RU_r * RU_j\right)$$

d. Please confirm that the Workload Factors, the Revenue Unit "Bands," and their respective weights used in the Bradley Study, are the same as those listed in Table 1 and Table 2. If you do not confirm, please modify Table 1 and Table 2 (or combine them) to reflect the Workload Factors, Revenue Unit Bands, and their corresponding weights used in the Bradley Study.

e. Please confirm that the definition of the revenue-unit value used in the Bradley Study is the same as it was for Witness Wang, namely the average revenue for 1,000 pieces of originating mail and special services.

   i. If you do not confirm, please explain the reason the definition of the revenue-unit value was changed.

   ii. If you do not confirm, please provide the definition of the revenue-unit value used in the Bradley Study.

   iii. Please provide the revenue-unit value used in the Bradley Study.

f. Please explain whether, and if so why, WSCs are calculated and utilized in the Bradley Study if there is a missing value for any row in Table 1 or Table 2, or any row if the workload and/or revenue factors used in the Bradley Study differ from the currently accepted ones.

2. Please refer to USPS-RM2020-2/1 - Public Material Relating to Proposal Ten, April WSC Data.xlsx (April Dataset). Please provide an Excel Worksheet or SAS data file which would allow one to calculate the WSCs for each observation.

3. Please refer to the April Dataset and to the Bradley Study, which states "…the Postal Service now routinely collects data on Postmaster workload for operational purposes. The operational data are collected through an electronic version of the PS

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[3] Witness Wang refers to this formula as a weighted average, but it might be more accurate to refer to it as a "weighted sum," since the weights do not sum to 1.00.

Form 150, which measures and calculates workload for each EAS Post Office and determines the relevant Postmaster grade." Bradley Study, at 9.

a. Please explain the reason the month of April was chosen to calculate the WSCs used in the Bradley Study.

b. Please confirm that the Postal Service performs monthly collection of data from the electronic PS Form 150.

   i. Please explain how often collection of data is made if you do not confirm.

   ii. Please discuss the feasibility of collecting data for another month in FY 2019 if you do not confirm.

c. In light of the electronic collection of PS Form 150, please explain why the Postal Service did not develop a study dataset for each Post Office in Public Library Reference 1, or a similarly large number Post Offices, across two or more months.

4. Please refer to the Bradley Study, Table 7, at 22, and the April Dataset.

a. Please confirm that if one sorts the data by EAS to determine the beginning and ending cells of each EAS, and one uses the Excel "Min" and "Max" functions to identify the minimum and maximum WSC between the beginning and ending cells for each EAS, the ranges are as follows: EAS-18 (28-5,851), EAS-43 (995-5,956), EAS-20 (1,287-19,725), EAS-21 (683-41,831), EAS-22 (13,915-79,337), EAS-24 (35,764-163,656), EAS-26 (155,580-395,378).[4]

b. Please reconcile these WSC ranges with those shown in the Bradley Study, Table 7, at 22.

5. Please list the number of Post Office supervisors with an EAS of 18, 18B (or 43), 20, 21, 22, 24, and 26 included in the electronic collection of PS Form 150 in April 2019. If there were more than 13,611, please provide the reason(s) why they were not included in the Bradley Study.

6. Please state whether the Postal Service considered using an independent variable other than Workplace Service Credits.

a. If not, please explain.

b. If so, please explain and define each of the other independent variables considered.

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[4] The PR obtains the same results by making a pivot table, with the Grade Column placed in the "ROWS" box and selecting the Min value of WSC in the $\sum$ VALUES box and then the Max value in the $\sum$ VALUES box.

c. If other independent variables were considered, please explain why they were rejected.

d. If logistic regressions of the form proposed in this docket were run using an independent variable other than WSCs, please provide copies of each SAS program, output, and log.

Respectfully submitted,

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